

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NICOLE TAYLOR REED,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	
BIG LOTS STORES, INC.,)	2:06-CV-00380-MHT-CSC
)	
Defendant.)	
)	
)	

MOTION FOR ADMISION PRO HAC VICE

Pursuant to Rule 83.1(b) of the local rules of the United States District Court for the Middle District of Alabama, the undersigned counsel hereby move for Stephen X. Munger and Gregory L. Smith, Jr. to be admitted pro hac vice to the bar of this Court for the purpose of representing Defendant Big Lots Stores, Inc. in this matter.¹ In support of this Motion, the following information is provided:

- (a) Full name of the movant-attorney: Stephen X. Munger, with the firm of Jackson Lewis LLP in Atlanta, Georgia, is a licensed attorney and an active member in good standing of the Bar of the State of Georgia, the Bar of the State of Michigan, and the Bar of the State of Mississippi. He is also a member in good standing of the bars of the following courts: the U.S. District Courts for the Northern and Southern Districts of Georgia; the U.S. District Court for the Eastern District of Michigan; the U.S. Court of Appeals for the Third Circuit; the U.S. Court of Appeals for the Fourth Circuit; the U.S. Court of Appeals for the Sixth Circuit; and the U.S. Court of Appeals for the Eleventh Circuit.
- (b) Full name of the movant-attorney: Gregory L. Smith, Jr., also with the firm of Jackson Lewis LLP in Atlanta, Georgia, is a licensed attorney and an active member in good standing of the Bar of the State of Georgia. He is also a member in good standing of the bars of the following courts: the U.S. District Courts for the Middle and Northern Districts of Georgia; the

¹ A check in the amount of \$40.00 will be mailed to the Clerk's office to cover the costs associated with this filing.

U.S. Court of Appeals for the Sixth Circuit; and the U.S. Court of Appeals for the Eleventh Circuit.

- (c) Address, telephone number and fax number of the movant-attorneys: Jackson Lewis LLP, 1900 Marquis One Tower, 245 Peachtree Center Avenue, NE, Atlanta, Georgia 30303; T: 404-525-8200; F: 404-525-1173.
- (d) Name of the Firm or letterhead under which the movants practice: Jackson Lewis LLP.
- (e) Bars, state and federal, of which the movants are members, with registration numbers: Mr. Munger: Georgia Bar No. 529611; Michigan Bar No. P34286; Mississippi Bar No. 30135; Mr. Smith: Georgia Bar No. 658369.
- (f) The movants are members in good standing of the State Bar of Georgia and are not under suspension or disbarment from any bar. See attached Certificates of Good Standing from the Northern District Court of Georgia.
- (g) Movants do not reside in the Middle District of Alabama, and are not regularly employed in this district and do not regularly engage in the practice of law in this District.
- (h) Mr. Munger and Mr. Smith are familiar with the Federal Rules of Civil Procedure, the Local Rules for the Middle District of Alabama, the ethical limitations and requirements governing the behavior of members of the Alabama State Bar, and the American Bar Association Model Rules of Professional Conduct.
- (i) Mr. Munger and Mr. Smith are co-counsel in this matter with Joseph T. Carpenter, a member in good standing of the Alabama Bar, Bar No. CAR-038, and the United States District Court for the Middle District of Alabama. Mr. Carpenter's office address is: 303 Sterling Centre, 4121 Carmichael Road, Montgomery, Alabama 36106, (334) 213-5600, (334) 213-5650 (facsimile).

Movants respectfully request that this Motion be granted and that they be admitted pro hac vice to the bar of the Court to appear in the instant matter.

Respectfully submitted this 30th day of May, 2006.

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Gregory L. Smith, Jr.
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ATTORNEYS FOR DEFENDANT
BIG LOTS STORES, INC.

CERTIFICATE OF SERVICE

I, Joseph T. Carpenter, do hereby certify I have served Plaintiff with the foregoing **MOTION FOR ADMISSION PRO HAC VICE** by causing a copy to be sent via certified mail, return receipt requested, to:

Nicole Taylor Reed
1148 Barley Drive
Montgomery, Alabama 36111

This, the 30th day of May, 2006.

/s/ Joseph T. Carpenter
Joseph T. Carpenter